

Exhibit C

From: [Steven R. Pounian](#)
To: [Kellogg, Michael K.](#); [Hansen, Mark C.](#); [Rapawy, Gregory G.](#); [Shen, Andrew C.](#); [Kry, Robert](#); [Nitz, Eric](#)
Cc: [Kreindler, James](#); [Megan Benett](#); [Maloney, III, Andrew](#); [Gavin Simpson](#); ["Jeanne M. O'Grady"](#); [Capone, Thea](#)
Subject: [EXTERNAL] 9/11 litigation
Date: Tuesday, April 4, 2023 5:24:48 PM

Dear Counsel,

We write on behalf of the *Ashton* plaintiffs regarding the Court's March 13, 2023 Order, which requires the parties, including *Ashton*, to meet and confer regarding proposals for motions to dismiss to be filed by Saudi Arabia and Dallah Avco.

The *Ashton* plaintiffs will ask the Court to reaffirm their rights to submit separate motion papers, including their own opposition to the defendants' motions to dismiss, and their own motions to establish jurisdiction and for a jurisdictional hearing.

Regarding the motions involving Saudi Arabia, we propose main briefs of 100 pages given the level of factual detail required to address the issues at stake. Our brief will include our motions. We will also request the opportunity to reply to Saudi Arabia's opposition to our motions.

We will oppose any attempts to impose page limits or other arbitrary restrictions on supporting papers that address the facts and evidence.

We are available and ready to discuss these matters further with you. Please let us know.

Regards,

Steven R. Pounian
Of Counsel



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